



February 28, 2024

VIA ECF

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street, Room
New York, NY 10007

Re: *Alexey Tarasov, et al. v. Port Authority of New York and New Jersey, et al.*,
Civil Action No. 1:21-cv-06226-NRB

Dear Judge Reice Buchwald,

The following is a joint status report filed pursuant to Your Honor's Memorandum Endorsement of the Report of the Parties' Rule 26(f) Planning Meeting ("Rule 26 Report"). Dkt. 13 (Endorsed Rule 26 Report) at 6 ("The parties shall file a report to the Court every 60 days on the status of discovery.").

The Rule 30(b)(6) depositions were originally scheduled for January 31, 2024 and February 2, 2024, however the Parties rescheduled the depositions due to an unforeseen change in Defendants' counsel's trial schedule. On February 13 and 14, 2024, Plaintiffs deposed three Rule 30(b)(6) designees identified by Defendants after the Parties met and conferred to narrow the 30(b)(6) topics. On February 16, 2024, Plaintiffs served its Requests for Admission on Defendants.

The Parties conferred in advance of this joint submission regarding expert disclosures and the schedule for same. Counsel for Defendants has a three-week trial starting in May that will likely present a significant challenge in timely serving Defendants' expert disclosures and scheduling and completing expert depositions. Furthermore, only two of the three Rule 30(b)(6) deposition transcripts have been received (both just this afternoon) by the Parties, and the transcripts are critical pieces of discovery to be reviewed by both Plaintiffs' and Defendants' experts. Accordingly, the Parties respectfully request the below extension to accommodate any unforeseen issues that may arise.

Should the Court grant this discovery extension request, the following is an amended scheduling order:

Action Item	Current Date	[Proposed] Date
Disclosure of Plaintiffs' Rule 26 expert information by	March 29, 2024	April 26, 2024
Disclosure of Defendants' Rule 26 expert information by	April 26, 2024	May 31, 2024
Expert witness depositions complete by	May 24, 2024	June 28, 2024
All discovery complete by	June 28, 2024	July 26, 2024

So Ordered
Naomi Reice Buchwald
USDS
2/29/24

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The parties thank the Court for its attention to this matter. If there is any more information that the Court requires, or if counsel can be of any further assistance, we are available at Your Honor's convenience.

The parties will continue to work cooperatively towards the timely completion of discovery.

Respectfully Submitted,

/s/ Cheryl N. Alterman (with permission)
Cheryl N. Alterman, Esq.
Attorney for Defendants

/s/ J. Christopher Amrhein, Jr.
J. Christopher Amrhein, Jr., Esq.
Attorney for Plaintiffs